

*United States Attorney  
Southern District of New York*

April 29, 2016

**BY ECF**

The Honorable Edgardo Ramos  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: United States v. Ahmed Mohammed El Gammal, 15 Cr. 588 (ER)**

Dear Judge Ramos:

The Government writes to update the Court as to the status of discovery in the above-captioned case. The Government has completed unclassified discovery. With respect to outstanding classified discovery, the Government has, with the assistance of the Classified Information Security Officer and other Court personnel, set up a dedicated computer terminal in the courthouse for defense counsel to review the materials. Because of an unforeseen server problem earlier today, the materials will not be accessible until Monday, May 2. The Government has advised defense counsel of the server problem. Once these materials become accessible, the Government will have completed classified discovery as well.

In addition, the Government requests that, prior to the next status conference in this case, the Court hold a pretrial conference, pursuant to Section 2 of the Classified Information Procedures Act, to consider matters relating to classified information that may arise in connection with this case.

Finally, the Government respectfully requests that the Court exclude time under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), between today and the new conference date, in order to allow the defendant and defense counsel to review discovery, and the parties to prepare for trial. A proposed order excluding time is attached for the Court's consideration.

Respectfully submitted,

PREET BHARARA  
United States Attorney

By: /s/  
Brendan F. Quigley/Andrea L. Surratt/ Negar Tekeei  
Assistant United States Attorneys  
(212) 637-2190 / 2493 / 2482

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UNITED STATES OF AMERICA	:	<u>ORDER</u>
-v.-	:	15 Cr. 588 (ER)
AHMED MOHAMMED EL GAMMAL,	:	
Defendant.	:	

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Upon the application of the United States of America, by and through Preet Bharara, United States Attorney, Brendan F. Quigley, Andrea L. Surratt, and Negar Tekeei, of counsel, it is hereby ORDERED that the time from April 29, 2016, through \_\_\_\_\_, is hereby excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A). The Court finds that the granting of such an exclusion best serves the ends of justice and outweighs the best interests of the public and the defendant in a speedy trial because it will allow the defendant to review the discovery in this case, and the parties to prepare for trial.

SO ORDERED.

Dated: New York, New York  
April \_\_\_\_, 2016

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THE HONORABLE EDGARDO RAMOS  
UNITED STATES DISTRICT JUDGE